HEARING DATE: 03/16/2010 AT 10:00 a.m. RESPONSE DEADLINE: 03/09/2010 AT 4:00 p.m.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Ouebecor World (USA), Inc., et al.¹,

Debtors.

Bk. No. 08-10152-JMP (Jointly Administered)

Chapter 11

Honorable James M. Peck

Eugene I. Davis, as Litigation Trustee for the Quebecor World Litigation Trust,

Plaintiff,

vs.

Defendants Listed on Exhibit "A" annexed to the Procedures Motion,

Adv Nos. Refer to Exhibit "A"

NOTICE OF PLAINTIFF'S MOTION FOR AN ORDER ESTABLISHING STREAMLINED PROCEDURES GOVERNING ADVERSARY PROCEEDINGS BROUGHT BY EUGENE I. DAVIS, AS LITIGATION TRUSTEE FOR THE QUEBECOR WORLD LITIGATION TRUST,
PURSUANT TO SECTIONS 502, 547, 548, 549 AND 550 OF THE BANKRUPTCY CODE AND EXTENDING THE 120-DAY TIME LIMIT FOR SERVICE OF THE SUMMONSES AND COMPLAINTS

PLEASE TAKE NOTICE that upon the annexed procedures motion (the "Procedures Motion") Eugene I. Davis, as Litigation Trustee for the Quebecor World Litigation Trust (the "Plaintiff" or "Litigation Trustee"), by and through his undersigned counsel, ASK Financial, LLP ("ASK"), will move before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 601, One Bowling Green, New York, NY 10004-1408, on March 16, 2010 at 10:00 a.m. (the "Hearing"), or as soon thereafter as counsel may be heard, for the entry of a procedures order (the "Procedures Order"), pursuant to sections 102(1) and 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rules 7004(m), 7016, 7026 and 9006 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), and General Order M-390 of the United States Bankruptcy

The Debtors are the following entities: Quebecor World (USA) Inc., Quebecor Printing Holding Company, Quebecor World Capital Corporation, Quebecor World Capital II GP, Quebecor World Capital II LLC, WCZ, LLC, Quebecor World Lease GP, Quebecor World Lease LLC, QW Memphis Corp., The Webb Company, Quebecor World Printing (USA) Corp., Quebecor World Loveland Inc., Quebecor World San Jose Inc., Quebecor World Buffalo Inc., Quebecor World Johnson & Hardin Co., Quebecor World Northeast Graphics Inc., Quebecor World UP Graphics Inc., Quebecor World Great Western Publishing Inc., Quebecor World DB Acquisition Corp., WCP-D, INC., Quebecor World Taconic Holdings Inc., Quebecor World Retail Printing Corporation, Quebecor World Arcata Corp., Quebecor World Nevada Inc., Quebecor World Atglen Inc., Quebecor World Krueger Acquisition Corp., Quebecor World Book Services LLC, Quebecor World Dubuque Inc., Quebecor World Pendell Inc., Quebecor World Fairfield Inc., QW New York Corp., Quebecor World Dallas II Inc., Quebecor World Nevada II LLC, Quebecor World Dallas, L.P., Quebecor World Mr. Morris II LLC, Quebecor World Dallas II Inc., Quebecor World Hazleton Inc., Quebecor World Olive Branch Inc., Quebecor World Dittler Brothers Inc., Quebecor World RAI Inc., Quebecor World KRI Inc., Quebecor World Century Graphics Corporation, Quebecor World Waukee Inc., Quebecor World Logistics Inc., Quebecor World Mid-South Press Corporation, Quebecor World Lincoln Inc., Quebecor World Memphis LLC.

Court for the Southern District of New York, establishing streamlined procedures governing all adversary proceedings brought by Plaintiff under sections 502, 547, 548, 549 and 550 of the Bankruptcy Code, which are identified in <u>Exhibit "A"</u> annexed to the Procedures Motion (collectively, the "<u>Avoidance Actions</u>").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought by the Procedures Motion must be in writing, conform to the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the United States Bankruptcy Court for the Southern District of New York, and must be filed and served so as to be received no later than March 9, 2010 by 4:00 p.m. (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that pursuant tot General Order M-242², any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i.) through the Bankruptcy Court's Electronic Case Filing System ("<u>ECF</u>")³ which may be accessed at the Bankruptcy Court's Internet web site at <u>www.nysb.uscourts.gov</u>, using Netscape Navigator software version 3.0 or higher, and (ii.) in portable document format ("<u>PDF</u>") using Adobe software for conversion.

PLEASE TAKE FURTHER NOTICE that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline in PDF format on a 3-1/2" floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

PLEASE TAKE FURTHER NOTICE that any party that is either without legal representation or that is unable to file documents electronically or create documents in PDF format, shall file its objection on or before the Objection Deadline in either Word, WordPerfect or DOS text (ASCII) format on a 3-1/2" floppy diskette in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

²Copies of General Order M-242 and the User's Manual for the Bankruptcy Court's Electronic Case Filing System are available at the official web site of the United States Bankruptcy Court for the Southern District of New York at www.nysb.uscourts.gov.

³Filing documents on the ECF requires a password which an attorney may obtain by contacting the Bankruptcy Court's technical assistance department.

PLEASE TAKE FURTHER NOTICE that a hard copy of any objection must be hand delivered to the Chambers of the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Room 501, One Bowling Green, New York, NY 10004-1408, on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that objection, if any, must be served in accordance with the provision of General Order M-242 so that they are received on or before the Objection Deadline by ASK Financial LLP, 2600 Eagan Woods Drive, Suite 400, St. Paul, MN 55121, Attn: Karen M. Scheibe, Esq.

Dated: January 27, 2010

ASK FINANCIAL LLP

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